

REMARKS

Rejections under 35 U.S.C §103

Claims 1-3, 7-12 and 14-18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Pat. No. 5,465,189 to Polgreen in view of U.S. Pat. No. 6,621,133 to Chen et al. The Applicants respectfully disagree.

Rejection of claim 1

The Applicants agree with the Examiner that Polgreen does not show *"a plurality of isolated islands distributed in the first doped region so that the resistance of the first doped region is increased, wherein at least one of the isolated islands is completely surrounded by the first doped region"*, as recited in claim 1.

In page 3 of the Action, the Examiner asserts that Chen teaches *"a plurality of isolated islands (32a) distributed in the first doped region (22) having the second conductivity type (n+ type), wherein at least one of the isolated islands (32a) is completely surrounded by the first doped region (22) (figure 5)"*. Further, in page 3 of the Action, the Examiner asserts that *"it would have been obvious to incorporate the teachings of Chen into the device of Polgreen because it increases the resistivity of the diffusion areas"*.

The Applicants respectfully disagree and note that Chen does not teach that islands 32 provides for increasing the resistance of doped region 22. Islands 32 are disclosed in relation with a first embodiment of Chen, and in column 6, lines 30-34, Chen recites that *"The ESD protection device in the first embodiment of this invention has a rather symmetrical design. Consequently, the parasitic bipolar transistors 110, 112, 114 and 116 each have identical base resistance values. Hence, the parasitic bipolar transistors 110, 112, 114, 116 within the MOS transistor region switch on concurrently and uniformly."* The Applicants submit that Chen teaches having identical base resistance values in parasitic transistors 110, 112, 114, 116 through symmetrical design, and would therefore not have provided one skilled in the art with the specific motivation of increasing the resistivity of the diffusion areas, contrarily to the assertions of the Examiner. Should the Examiner disagree, Applicants respectfully request him to clearly and specifically point out where Chen discloses this feature in accordance with 37 C.F.R. 1.104(c)(2).

Further, the Applicants note that the isolated island 32a of Chen has a first side in contact with first doped region 22 having the second conductivity type, and a second side in contact with another doped region 34 having the first conductivity type. The Applicants therefore submit that island 32 of Chen cannot be deemed to disclose or suggest an island "completely surrounded by the first doped region", as recited in claim 1. The Applicants submit that because neither Polgreen nor Chen disclose isolated islands "*wherein at least one of the isolated islands is completely surrounded by the first doped region*" as recited in claim 1, even if one skilled in the art had combined the teaching of Polgreen and Chen, he would not have obtained the circuit recited in claim 1. The Applicants therefore submit that claim 1 is patentable over Polgreen in view of Chen.

Rejection of claim 12

The above arguments with regard to claim 1 can be used to show that, even if one skilled in the art had for any reason combined Polgreen and Chen, although he would not have been motivated to do so, he would not have obtained a circuit as recited in claim 12, and in particular comprising "*a plurality of isolated islands ... wherein at least one of the isolated islands is completely surrounded by the first doped region*". The Applicants therefore submit that claim 12 is patentable over Polgreen in view of Chen.

Rejection of claims 2-3, 7-11 and 14-18

Claims 2-3 and 7-11 depend on claim 1 and claims 14-18 depend on claim 12. The Applicants submit that at least in view of their dependency, claims 2-3, 7-11 and 14-18 are patentable over Polgreen in view of Chen.

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In view of the above, Applicants submit that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

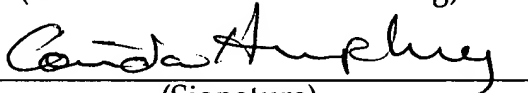
The Commissioner is authorized to charge any additional fees that may be required or credit overpayment to deposit account no. 12-0415. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as

including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 12-0415.

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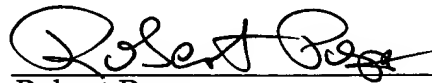
January 26, 2005
(Date of Transmission)

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January 26, 2005
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